

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VICTOR GULLEY,

PLAINTIFF,

v.

**MARKOV & KRASNY
ASSOCIATES, P.C.,**

DEFENDANT.

Case No. 10-cv-01807

Hon. Elaine E. Bucklo

Mag. Judge Arlander Keys

MOTION FOR AN EXTENSION TO FILE ANSWER OR OTHER PLEADING

Defendant, Markoff & Krasny, an Illinois partnership (improperly denominated in the Complaint as “Markov & Krasny Associates, P.C.”) (“Defendant”), respectfully moves this Court for an extension of time to answer and/or otherwise plead in the above-captioned action.

In support of this Motion, Defendant states as follows:

1. Defendant was served with the Complaint in this matter on or about May 10, 2010.
2. However, Defendant did not retain undersigned counsel until on or about May 21, 2010.
3. Undersigned counsel was out of the office for a previously planned vacation from May 26-31, 2010.
4. Defendant’s answer or otherwise pleading in response to Defendant’s Complaint is due today, June 1, 2010.
5. In spite of Defendant’s and counsel’s best efforts to decipher the accounts allegedly at issue in Plaintiff’s Complaint, the accounts purportedly at issue are not identified by name, any sort of reference number and/or state court case number. Defendant is diligently

searching for documents relevant to its response to Plaintiff's Complaint, but as of today's date, has not gathered those documents for counsel to be able to respond to Plaintiff's Complaint.

WHEREFORE, for the reasons stated above, which Defendant asserts constitute good cause, Defendant asks that this Court grant it an additional twenty-one (21) days, up to and including June 23, 2010, in order to file its answer or other pleading in response to Plaintiff's Complaint.

Respectfully submitted,

/s Stacie E. Barhorst
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(improperly denominated in the Complaint
as "Markov & Krasny Associates, P.C.")*